

United States Courts
Southern District of Texas
FILED

APR 20 2005

Richard L. Kirby, Clerk of Court

A091 (Rev. 8/01) Criminal Complaint

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

V.

Zhang YING SHUN
[REDACTED]

Ji Lin Sheng, China

CRIMINAL COMPLAINT

Case Number: C-05-263M

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about 4/19/2005 in Brooks County, in the

Southern District of Texas defendant, Zhang YING SHUN

did knowingly and unlawfully enter the United States from Mexico, at a point near Hidalgo, Texas, which said time and place was other than as designated by immigration officials of the United States for the entrance of immigrants into the United States,

in violation of Title 8 United States Code, Section(s) 1325
I further state that I am a(n) Special Agent and that this complaint is based on the
Official Title

following facts:

On April 19, 2005, Falfurrias U.S. Border Patrol Agents performed a search on a tractor truck and trailer at the Falfurrias Border Patrol checkpoint. The search was performed subsequent to a K-9 alert and resulted in the discovery of seventeen individuals hiding inside the trailer. Immigration examinations performed on the individuals revealed all seventeen were citizens and nationals of China and were illegally present in the United States. Record Checks revealed a female identified as Zhang YING SHUN (1 of the 17 aliens) is an illegal Chinese alien who was expeditiously removed from the Los Angeles Airport on March 22, 2003. Record checks indicate she was removed because she attempted to enter the United States using a false passport. SHUN admitted to entering the U.S. by crossing the Rio Grande River from Mexico into the United States on an inner tube near Hidalgo, Texas, on or about April 15, 2005, in an area not designated for the entrance of immigrants.


Signature of Complainant

Eric Martinez

Printed Name of Complainant

Sworn to before me and signed in my presence,

April 20, 2005

Date

B. Janice Ellington, U.S. Magistrate Judge

Name and Title of Judicial Officer

at

Corpus Christi, Texas

City and State


Signature of Judicial Officer